

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

WILLIAM QUINONES AMBERT
SONIA NOEMI GONZALEZ BAEZ

DEBTORS

CASE NO 15-05767-MCF

CHAPTER 13

**DEBTORS' MOTION AND NOTICE OF FILING OF POST-CONFIRMATION
MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329**

TO THE HONORABLE COURT:

NOW COME, WILLIAM QUINONES AMBERT and SONIA NOEMI GONZALEZ BAEZ, through the undersigned attorney, and very respectfully state and pray as follows:

1. The debtors are hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated April 5, 2016, herewith and attached to this motion.
2. This Plan modification is filed to amend the Payment Plan Schedule due to debtors' current financial situation.

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)(2)(b)

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the debtors and to all creditors and interested parties appearing in the master address list, hereby attached.

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Post confirmation modification of chapter 13 Plan
Case no. 15-05767-MCF13

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 5th day of April, 2016.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC 203614
ATTORNEY FOR PETITIONER
PO BOX 186
CAGUAS PR 00726-0186
TEL 787-744-7699 FAX NO 787-746-5294
EMAIL: rfigueroa@rfclawpr.com

United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. 3:15-bk-5767

QUINONES AMBERT, WILLIAM & GONZALEZ BAEZ, SONIA NOEMI

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: 4/05/2016

☐ AMENDED PLAN DATED: _____

☐ PRE ☒ POST-CONFIRMATION

Filed by: ☐ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

\$ 375.00 x 8 = \$ 3,000.00
\$ 325.00 x 52 = \$ 16,900.00
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____

TOTAL: \$ 19,900.00

Additional Payments:

\$ _____ to be paid as a LUMP SUM
within _____ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in
addition to the above:

\$ _____ x _____ = \$ _____

PROPOSED BASE: \$ 19,900.00

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee
Disclosure Statement: \$ 2,888.00

Signed: _____

Debtor

Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☐ Trustee pays secured ARREARS:

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

2. ☒ Trustee pays IN FULL Secured Claims:

Cr. Reliable Financial Se Cr. _____ Cr. _____
x3632 # _____ # _____
\$ 14,112.00 \$ _____ \$ _____

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

4. ☒ Debtor SURRENDERS COLLATERAL to Lien Holder:

Coop De A/c Orienta

5. ☐ Other:

6. ☐ Debtor otherwise maintains regular payments directly to:

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☐ Classifies ☒ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: _____

☐ Paid 100% / ☐ Other: _____

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)

* Debtors to provide ADEQUATE PROTECTION PAYMENTS to Reliable
Financial Services through the Trustee in the sum \$150 per month until
confirmation.

* Debtors to provide auto insurance (Eastern America Insurance
Company) upon maturity to Reliable Financial Services through the
Plan.

Attorney for Debtor RFiguerola Carrasquillo Law Office PSC

Phone: (787) 744-7699

AMENDED CHAPTER 13 PAYMENT PLAN

IN RE QUINONES AMBERT, WILLIAM & GONZALEZ BAEZ, SONIA NOEMI Debtor(s) Case No. 3:15-bk-5767

AMENDED CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 1

	Cr	#	\$
Executory Contracts - Assumed:	Gloria Lizardi Rivera		

Label Matrix for local noticing
0104-3
Case 15-05767-MCF13
District of Puerto Rico
Old San Juan
Tue Apr 5 12:53:32 AST 2016

COOP A/C ORIENTAL
PO BOX 876
HUMACAO, PR 00792-0876

Quantum3 Group LLC as agent for
Sadino Funding LLC
PO Box 788
Kirkland, WA 98083-0788

RELIABLE FINANCIAL SERVICES
PO BOX 21382
SAN JUAN, PR 00928-1382

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

Acceptance Now
5501 Headquarters Dr
Plano, TX 75024-5837

Ahorro Muebles
Carr 172 De Caguas A Cidra
Caguas, PR 00725

COOP DE A/C ORIENTAL
PO BOX 876
HUMACAO, PR 00792-0876

Caribbean Finance
PO Box 9046
Caguas, PR 00726-9046

Claro
Po Box 360998
San Juan, PR 00936-0998

First Federal Savings
Ponce De Leon Av Stop 23
San Juan, PR 00901

Islandfin
Pob 71504
San Juan, PR 00936-8604

MONEY EXPRESS
CONSUMER SERVICE CENTER
BANKRUPTCY DIVISION- (CODE 248)
PO BOX 9146
SAN JUAN, PR 00908-0146

OASIS FINANCIAL SERVICES
PO BOX 1011
BAYAMON PR 00960-1011

Oasis Fin Sv
275 Lemay Ferry Ro
Saint Louis, MO 63125-1239

SANTANDER FINANCIAL D/B/A ISLAND FINANCE
PO BOX 195369
SAN JUAN PR 00919-5369

Synchrony Bank
c/o of Recovery Management Systems Corp
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

ALEJANDRO OLIVERAS RIVERA
ALEJANDRO OLIVERAS CHAPTER 13 TRUS
PO BOX 9024062
SAN JUAN, PR 00902-4062

MONSITA LECAROS ARRIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901

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SONIA NOEMI GONZALEZ BAEZ
275 LUIS LOZADA ST (BAJOS)
CAGUAS, PR 00725-5442

WILLIAM QUINONES AMBERT
275 LUIS LOZADA ST (BAJOS)
CAGUAS, PR 00725-5442

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

(d)RELIABLE FINANCIAL SERVICES, INC.
P.O. BOX 21382
SAN JUAN, PR 00928-1382

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Quantum3 Group LLC as agent for	End of Label Matrix	
Sadino Funding LLC	Mailable recipients	21
PO Box 788	Bypassed recipients	1
Kirkland, WA 98083-0788	Total	22